

WISHA Interim Operations Memorandum
Washington Department of Labor and Industries
#99-1-G
QUALIFICATIONS OF MARITIME INSPECTORS

Approved: Michael Wood, Senior Program Manager
WISHA Policy & Technical Services

Date Issued: January 29, 1999

Background

The Department of Labor and Industries conducts inspections and consultations in a variety of maritime and waterfront-related activities. Historically, these activities have been performed by a specialized staff with periodic support from other inspectors and consultants. This policy grows out of a desire to clearly identify which staff are qualified to perform which activities related to the waterfront, and to provide a means of creating and maintaining an inventory of appropriately skilled staff. It is based on a decision made by the 1997 issues-based labor-management committee on maritime issues that lists of qualified inspectors would be maintained by WISHA Policy & Technical Services (as well as the decision to return to the use of selective certification to hire maritime specialists with journey-level experience from within the maritime industry).

This memorandum provides guidance regarding the basic content of such lists and the process to maintain them.

Policy

1. WISHA staff engaged in maritime activities – whether regularly or periodically -- will be grouped according to the following categories:

- a. *Shipbuilding, Shipbreaking, and Ship Repair*

- i. *Comprehensive.*

This category describes a maritime safety inspector or consultant able to conduct independent comprehensive inspections or consultations within SIC 3731.

- ii. *Basic.*

This category describes an inspector or consultant who has received basic training in the shipbuilding industry and is able to function as part of a team within SIC 3731. He or she may have some level of specialization and be able to conduct limited scope activities within that specialized area, but cannot be expected to conduct a comprehensive inspection or consultation independently.

- iii. *Hygiene.*

This category describes an industrial hygienist or consultant who has received basic training in the shipbuilding industries, with an emphasis on industrial hygiene related hazards. He or she may function as a member of a team or may conduct a comprehensive industrial hygiene inspection or consultation within SIC 3731.

iv. Limited Hygiene

This category describes an industrial hygienist or consultant who has received basic training and is able to function as part of a team within SIC 3731. He or she may also be able to conduct limited scope activities within a specialized area, but cannot be expected to conduct a comprehensive industrial hygiene inspection or consultation independently.

*b. Boatbuilding**i. Comprehensive.*

This category describes a maritime inspector or consultant able to conduct independent comprehensive inspections or consultations within SIC 3732.

ii. Basic.

This category describes an inspector or consultant who has received basic training in the boat-building industry and is able to function as part of a team within SIC 3732. He or she may have some level of specialization and be able to conduct limited scope activities within that specialized area, but cannot be expected to conduct a comprehensive inspection or consultation independently.

iii. Hygiene.

This category describes an industrial hygienist or consultant who has received basic training in the boat-building industries, with an emphasis on industrial hygiene related hazards. He or she may function as a member of a team or may conduct a comprehensive industrial hygiene inspection or consultation within SIC 3732.

iv. Limited Hygiene

This category describes an industrial hygienist or consultant who has received basic training and is able to function as part of a team within SIC 3732. He or she may also be able to conduct limited scope activities within a specialized area, but cannot be expected to conduct a comprehensive industrial hygiene inspection or consultation independently.

*c. Longshore, Stevedore and related operations (including Container, Bulk, Break bulk, Ro/Ro, Log Loading, Warehousing, Docks and Piers)**i. Comprehensive.*

This category describes a maritime inspector or consultant able to conduct independent comprehensive inspections or consultations in relation to active longshore/stevedoring operations.

ii. Basic.

This category describes an inspector or consultant who has received basic training in the longshore/stevedoring industry and is able to function as part of a team on the docks. He or she may have some level of specialization and be able to conduct limited scope activities within that specialized area, but cannot be expected to conduct a comprehensive inspection or consultation independently.

iii. Hygiene.

This category describes an industrial hygienist or consultant who has received basic training in the longshore/stevedoring industry, with an emphasis on industrial hygiene related hazards. He or she may function as a member of a team or may conduct a comprehensive industrial hygiene inspection or consultation on the docks.

iv. Limited Hygiene

This category describes an industrial hygienist or consultant who has received basic training and is able to function as part of a team on the docks. He or she may also be able to conduct limited scope activities within a specialized area, but cannot be expected to conduct a comprehensive industrial hygiene inspection or consultation independently.

d. Commercial Diving

This category describes a maritime inspector, industrial hygienist or consultant able to conduct independent comprehensive inspections or consultations in relation to commercial diving operations (not involving underwater activity on his or her part).

e. Vessel Operation

This category describes a maritime inspector or consultant able to conduct independent comprehensive inspections or consultations in relation to vessel operations (including charter boat inspections).

*f. Crane Inspections (including overhead, container, gantry, mobile and spout/sucker)**i. Comprehensive*

This category describes a crane inspector or consultant able to inspect the crane itself, as well as any necessary documentation. To conduct such inspections or consultations in relation to shipbuilding, boat-building, or longshore/stevedore activities, he or she must also be qualified at the basic level in the applicable industry(ies).

ii. Basic

This category describes those inspectors and consultants who have been given basic training in the essential crane enforcement issues and are able to readily inspect key operating practices and equipment, as well as the presence of the necessary paperwork.

g. Marinas (all waters)

This category describes a journey-level maritime inspector or consultant, who is able to conduct independent comprehensive inspections or consultations in relation to marina operations.

2. The maritime specialist in WISHA P&TS will maintain lists for each of the above categories. Inspectors and consultants will be placed on the list after the appropriate supervisor and the maritime specialist agree that the employee demonstrates the necessary qualifications.
 - a. Based on information gathered during the previous year, the maritime specialist will produce the first set of lists on February 1, 1999.
 - b. Supervisors may suggest any inspector, hygienist or consultant as a candidate to be added to one of the lists. If the maritime specialist in WISHA P&TS agrees, the individual will be added. If the maritime specialist does not believe adding the individual to the list would be appropriate, he or she will discuss the issue with the supervisor (and with the individual in question, if they desire) and they will determine whether additional training or other actions are appropriate. If the supervisor and the maritime specialist are unable to resolve a disagreement over whether an individual should be added to one of the lists, the issue will be resolved by the Senior Program Manager, WISHA P&TS, in consultation with regional management.
 - c. The maritime specialist may subdivide the lists (especially in relation to “basic” and “limited hygiene” categories) to more appropriately reflect areas of specialization.
 - d. The maritime specialist will evaluate the program at least annually to determine whether the categories should be modified to address additional areas of specialization or other issues.
3. Supervisors must not assign staff to activities within the areas covered by the lists unless the individual appears on the list in question (or unless the maritime specialist in WISHA P&TS agrees to add the individual to the list). This does not prevent supervisors from assigning individuals who are being trained to accompany qualified individuals as part of that training (any personal safety issues in such cases must be addressed in accordance with applicable internal safety and health guidelines).